

FILED

AUG - 8 2019

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND YOUNG,

Defendant.

4:19CR640 RWS/SPM

**INDICTMENT**

**COUNT I**

The Grand Jury charges that:

On or about December 12, 2018, in St. Louis, within the Eastern District of Missouri, the defendant,

**RAYMOND YOUNG,**

did knowingly and intentionally distribute a controlled substance to L.M., a person whose identity is known to the Grand Jury, in violation of Title 21, United States Code, Section 841(a)(1), and;

that L.M. suffered serious bodily injury as a result of the use of such controlled substance distributed by defendant, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT II**

The Grand Jury further charges that:

On or about December 12, 2018, in St. Louis County, within the Eastern District of Missouri, the defendant,

**RAYMOND YOUNG,**

did knowingly and intentionally distribute a controlled substance to J.S., a person whose identity is known to the Grand Jury, in violation of Title 21, United States Code, Section 841(a)(1), and;

that J.S. thereafter ingested the controlled substance distributed by defendants, and died as a result of the use of such controlled substance, making the offense punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT III**

The Grand Jury further charges that:

On or about February 6, 2019, in St. Louis County, within the Eastern District of Missouri, the defendant,

**RAYMOND YOUNG,**

did knowingly and intentionally possess, with the intent to distribute, a controlled substance in violation of Title 21, United States Code, Section 841(a)(1) and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT IV**

The Grand Jury further charges that:

On or about February 6, 2019, in St. Louis County, within the Eastern District of Missouri, the defendant,

**RAYMOND YOUNG,**

did knowingly and intentionally use, carry, and possess a firearm in furtherance of a drug trafficking crime, to-wit: possession with the intent to distribute a controlled substance as charged in Count III.

In violation of Title 18, United States Code, Section 924 (c)(1)(A) and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

### **FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853(a), upon conviction of an offense in violation of Title 21, United States Code, Section 841(a)(1), as set forth in Counts I and V, the defendant shall forfeit to the United States of America any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such violation, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such violation.

2. Subject to forfeiture is a sum of money equal to the total value of any property, constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of the violations set forth in Counts I, II, and III.

3. Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g)(1) or 924(c) as set forth in Count IV, the defendant shall forfeit to the United States of America any firearm or ammunition involved in or used or intended to be used in said violations.

4. Specific property subject to forfeiture includes, but is not limited to, the following:

a. Approximately \$124,538.00 U.S. Currency seized on February 6, 2019.

5. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

JEFFREY B. JENSEN  
UNITED STATES ATTORNEY

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